

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No: 1:14-CR-06

Hon. Janet T. Neff  
United States District Judge

DERIK EUGENE ROTHROCK,

Defendant.

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**DEFENDANT'S MOTION FOR DOWNWARD VARIANCE**

The defendant, Derik Eugene Rothrock, by his attorney Sharon A. Turek of the Office of the Federal Defender, moves this Honorable Court to vary downward from the applicable advisory guideline range in this matter. Under the 18 U.S.C. § 3553(a) factors and the standard for the imposition of a sentence sufficient, but not greater than necessary, a downward variance would be appropriate in this case. The basis for this requested variance is based on the defendant's tumultuous childhood, which is detailed at length in the final presentence investigation report and the defendant's Sentencing Memorandum.

Respectfully submitted,

RAY KENT  
Federal Public Defender

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Dated: July 7, 2014